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ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
HOWARD ROSENBERG	§	CASE 14-40512
	§	
DEBTOR	§	

MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON MOTION TO  
LIFT STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE BRENDA T. RHOADES:

COMES NOW, Howard Rosenberg ("Debtor") and files this its Request for Expedited Hearing on the Debtor's Motion to Lift Automatic Stay to Allow Divorce Proceeding to Continue

The Debtor is currently involved in a divorce proceeding. As a result of certain order entered by the Divorce Court, the debtor has been authorized to borrow funds from his life insurance to make certain payments including health insurance. The Debtor has filed a Motion to Lift Stay which the Debtor seeks to have the hearing on an expedited basis on or before April 29, 2014, so the Debtor can its insurance. . Notice of proposed expedited hearing as a well the Motion was sent via e-mail to the chapter 7 trustee and counsel for Mr and Mrs Rosenberg in the divorce proceeding.

This Motion was not presented earlier because counsel for the Debtor only learned on the

divorce court order and the deadline for the insurance premium on April 25, 2014.

Respectfully submitted,

\_\_\_\_/s/ Eric Liepins\_\_\_\_\_  
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PROPOSED ATTORNEYS FOR DEBTOR

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent to Mark Weisbart, 12770 Coit Road, Suite 541, Dallas, Texas, David Mao, 8828 Greenville, Dallas, Texas 75243 and Rebecca Manuel Campbell Centre I North Tower, 8350 Central Expressway Suite 111, Dallas, Texas 75206 on the 28<sup>th</sup> day of April 2014 via mail and e-mail.

\_\_\_\_/s/ Eric Liepins\_\_\_\_\_  
Eric Liepins